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January 5, 2021

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Steven I. Locke, U.S.M.J.  
100 Federal Plaza, Courtroom 920  
Central Islip, NY 11722-4438

**Re: Kwon v. Gold Coast Sports Cars, LLC, et ano.**  
**Case No.: 2:20-cv-4811 (JMA) (SIL)**  
**MLLG File No.: 127-2020**

Dear Judge Locke:

This firm represents the Defendants Gold Coast Sports Cars, LLC (the “Corporate Defendant”), and Evan Christodoulou (hereinafter the “Individual Defendant”) (the Corporate Defendant and Individual Defendant collectively hereinafter the “Defendants”). Defendants write to respectfully request an extension of time to respond to the complaint *nunc pro tunc*. Defendants’ request is made to this Court pursuant to ¶ 4(A) of the Hon. Joan M. Azrack’s Individual Rules, which require all non-dispositive pretrial motions and applications to be made here.

Pursuant to this Court’s Individual Motion Practices ¶ 2(B), Defendants respectfully submit that:

- (i) the original date of the deadline to respond to the complaint was December 7, 2020;
- (ii) the reason for the requested extension is because the associate attorney originally assigned to this case has left the firm and this case was only recently assigned to me;
- (iii) the adversary has consented to an extension of time until January 6, 2021; and
- (iv) there have been no previous requests for an extension of time to respond to the complaint.

Based on the foregoing, Defendants respectfully submit that good cause exists warranting an extension of time pursuant to Rule 6 of the Federal Rules of Civil Procedure. See Fed. R. Civ. P. 6(a)(1)(A).

Defendants thank this Court for its time and attention to this case

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Dated: Lake Success, New York  
January 5, 2021

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

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/s

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cc: Plaintiff (via ECF).